

Donald E. Haviland, Jr., Esquire
Adam S. Levy, Of Counsel, Esquire
Michael J. Lorusso, Esquire
The Haviland Law Firm, LLC
740 South Third Street
Third Floor
Philadelphia, PA 19147
(215) 609-4661 telephone
(215) 392-4400 facsimile

John E. Keefe, Jr., Esquire
Stephen Sullivan, Esquire
Keefe Bartels
830 Broad Street
Shrewsbury, NJ 07702
(732) 224-9400 telephone
(732) 224-9494 facsimile
COUNSEL FOR PLAINTIFF INTERNATIONAL UNION OF OPERATING ENGINEERS, LOCAL 68, WELFARE
FUND AND THE CLASS

International Union of Operating
Engineers, Local No. 68 Welfare Fund
(an unincorporated trust)

Plaintiff,

v.

AstraZeneca PLC; et al.

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MONMOUTH COUNTY

CIVIL ACTION NO. MON-L-3136-06

CASE MANAGEMENT ORDER 3

THIS MATTER having been opened to the Court by The Haviland Law Firm and Keefe Bartels, Counsel for Plaintiff and the Class, on Plaintiff's Motion pursuant to Rule 4:24-1(c) seeking the entry of a case management order extending the deadlines for discovery in this case, and having considered all papers submitted by the parties, along with oral argument, and for good cause shown;

THIS COURT, on this ____ day of **September, 2007**, **ORDERS** as follows:

1. This case is designated a "Coordinated State Court Case" pursuant to Case Management Order No. 9 issued in the matter of *In re Average Wholesale Price Litig*, MDL 1456 (D.Mass)(Saris, J.)(attached hereto). Per the terms of CMO 9, the Court will reach out to Judge Saris to ensure

coordination of this case with the MDL for purposes of both trial and mediation and/or settlement. The Court encourages Judge Bassler, the Court-appointed Special Master in this case, to do the same.

2. Written discovery by the parties shall be subject to the following limitations:

Plaintiff's Discovery:

Document Requests: Up to 125 total, including all sub-parts.

Interrogatories: Up to 125 total, including all sub-parts.

Defendants' Discovery:

Document Requests: Up to 125 total, including all sub-parts.

Interrogatories: Up to 125 total, including all sub-parts.

3. On or before MAY 30, 2008 - All fact discovery shall be concluded.
4. On or before JUNE 30, 2008 - Plaintiffs' expert(s) report(s), if any, shall be disclosed.
5. On or before JULY 31, 2008 - Defendants' expert(s) report(s), if any, shall be disclosed.
6. On or before August 31, 2008 - Deposition(s) of expert(s), if any, shall be concluded.
7. On November , 2008 - Trial shall begin.
8. No further extensions of the foregoing deadlines will be granted unless good cause is

shown.

A copy of this Order shall be served on all counsel of record within seven (7) days of the date hereof.

Honorable Louis F. Locascio, J.S.C.